

August 19, 2019

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

**RE: Oral Argument Regarding Procedural Issues**  
**Docket Nos. 2019-180-E; 2019-182-E; 2019-194-E; 2019-195-E; 2019-196-E;**  
**2019-197-E; 2019-207-E; 2019-208-E; 2019-209-E; 2019-210-E; 2019-211-E;**  
**2019-212-E; 2019-224-E; 2019-225-E; 2019-226-E; and 2019-227-E**

Dear Ms. Boyd:

I am writing on behalf of Duke Energy Carolinas, LLC; Duke Energy Progress, LLC; Dominion Energy South Carolina, Inc.; Lockhart Power Company (“LPC”);<sup>1</sup> the Southern Environmental Law Center; and the South Carolina Solar Business Alliance (collectively, the “Interested Parties”) regarding the oral arguments scheduled for August 20, 2019, before the Public Service Commission of South Carolina (the “Commission”) regarding “procedural scheduling issues” in the above-referenced dockets.

Given the broad scope of the oral argument scheduled for tomorrow (“procedural scheduling issues” in 16 dockets), in the interest of procedural efficiency, the Interested Parties are hereby notifying the Commission that, with the exception of the unique and discrete issue mentioned below related to the implementation of S.C. Code Ann. § 58-37-40 and electrical utility integrated resource planning, no issues of procedural controversy exist among the Interested Parties in the above-referenced dockets at this time. With the exception noted below, the Interested Parties do not believe any action by the Commission is required by Act 62 or needed by the Interested Parties in these dockets at this time.

Specifically, the Interested Parties agree as follows:

- Generator Interconnection Procedures (S.C. Code Ann. § 58-27-560): The Interested Parties agree that no action should commence in these dockets until next year, and that no action is needed from the Commission at this time.

---

<sup>1</sup> LPC serves less than one hundred thousand customer accounts; therefore, many of the provisions of the SC Energy Freedom Act do not apply to LPC, and LPC is not a party to most of the referenced dockets. However, LPC agrees that the only contested procedural issue before the Commission at this time is whether or not the Commission should open a generic docket to address guidelines for IRPs, as discussed herein.

The Honorable Jocelyn G. Boyd  
August 19, 2019  
Page 2

- Voluntary Renewable Energy Program (S.C. Code Ann. §58-41-30) and Community Solar Program (S.C. Code Ann. § 58-41-40): The Interested Parties agree that Act 62 sets forth the requirements, including relevant timelines, that the utilities must meet, and that no further action is needed by the Commission at this time. The parties agree that intervenors will have a reasonable period of time to review and comment on the utilities' programmatic filings and that all parties reserve their rights to request additional action by the Commission in these proceedings, but the parties further agree that there is not a pressing need for procedural schedules to be issued at this time.
- Net Energy Metering (S.C. Code Ann. § 58-40-20): The Interested Parties agree that no action is needed by the Commission at this time. The Interested Parties are in discussions to establish a consensus timeline for initial stakeholder discussions related to the net metering tariff to be effective June 1, 2021.
- Integrated Resource Plans (S.C. Code Ann. § 58-37-40): The Interested Parties agree that the utilities shall submit an Integrated Resource Plan in compliance with Act 62 in 2020. DEC, DEP, DESC, and LPC disagree with the proposal by SBA and SELC that the Commission should open a generic docket for consideration of guidelines/procedures to be established prior to the utilities filing their IRPs in 2020. This is the only procedural issue presently in controversy in the above-described dockets.

Counsel for the Interested Parties are happy to answer any questions from the Commission at the oral argument with regard to the matters in which no procedural controversy exists, but, in the interest of efficiency, the Interested Parties believed the above information would be helpful in guiding the discussion on Tuesday.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Rebecca J. Dulin

cc: Parties of Record (Via Email)  
Joseph Melchers, Esquire (Via Email)  
The Honorable Jocelyn Boyd (Via Email)